

1 On remand, the Commissioner shall consider all pertinent issues de novo, including
2 reconsidering the medical opinions and prior administrative medical findings regarding Plaintiff's
3 mental impairments; offer Plaintiff an opportunity for a new hearing; further develop the record as
4 necessary; and issue a new decision. The parties further request that the Clerk of the Court be directed
5 to enter a final judgment in favor of Plaintiff, and against Defendant, reversing the final decision of the
6 Commissioner.

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8 Dated: March 25, 2022

Respectfully submitted,

9 CHRISTOPHER CHIOU
10 Acting United States Attorney

11 /s/ Daniel P. Talbert
12 DANIEL P. TALBERT
Special Assistant United States Attorney

13 /s/ Hal Taylor
14 HAL TAYLOR
(By email authorization)
Attorney for Plaintiff

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17 IT IS SO ORDERED:

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19 HON. CAM FERENBACH
20 UNITED STATES MAGISTRATE JUDGE

21 DATED: 3-25-2022
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CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 160 Spear Street, Suite 800, San Francisco, California 94105. I am not a party to the above-entitled action. On the date set forth below, I caused service of **JOINT MOTION FOR REMAND** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

Hal Taylor
haltaylorlawyer@gbis.com

Attorney for Plaintiff

Dated: March 25, 2022

/s/ Daniel P. Talbert
DANIEL P. TALBERT
Special Assistant United States Attorney